

ATTACHMENT B

AFFIDAVIT OF HOMELAND SECURITY INVESTIGATIONS
SPECIAL AGENT JEREMY BLUTO

I, Jeremy Bluto, a Special Agent (SA) with the Homeland Security Investigations, Immigration and Customs Office (HSI / ICE), being first duly sworn, hereby depose and state as follows:

1. I am a SA with Immigration and Customs Enforcement / Homeland Security Investigations, Kansas City, Missouri, Principal Field Office, and have been so employed since April 25, 2010. I am currently assigned as a criminal investigator for HSI. Prior to my current position, I was employed with U.S. Customs and Border Protection, Office of Border Patrol, as a Border Patrol Agent and a Supervisory Border Patrol agent for five years, and a Deputy Sheriff with the Taney County, Missouri, Sheriff's Department for three years. Prior to my employment in Missouri, I attended California State University, Fullerton, and received a bachelor's degree in Criminal Justice. As part of this affiant's duties with HSI, I investigate criminal violations relating to child exploitation, child pornography, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422. I have received training in the areas of child pornography, child exploitation, coercion and enticement, and human/sex trafficking.

2. This affidavit is submitted in support of a criminal complaint charging Gevoni Rayon BROWN with violation of Title 18, United States Code, Section 2252(a)(1), transportation of child pornography.

3. The statements in this affidavit are based on my personal observations, training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this affiant has not included each and every fact known to me concerning this investigation. This

affiant has set forth the facts necessary to establish probable cause to believe that Gevoni Rayon BROWN has violated 18 U.S.C. § 2252(a)(1), that is, transportation of child pornography.

STATUTORY AUTHORITY

4. 18 U.S.C § 2252(a)(1) prohibits a person from knowingly transporting or shipping using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any mean including by computer or mails, any visual depiction, if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

PROBABLE CAUSE

5. On November 22, 2022, Richmond, California Police Department (RPD) Sergeant (SGT) Tong referred a case to HSI Task Force Officer (TFO) Darryl Holcombe for investigation. The case involves a 15-year-old minor female, Minor Victim 1 (MV1), who lives in Richmond, and an offender named Gevoni BROWN, who was believed to reside in Florida.

6. According to the RPD report, MV1's mother, C.B., found chats and images her daughter was sharing on Instagram with Instagram users "UE_GIO_2000," and "M2GEO2000." "UE_GIO_2000," and "M2GEO2000" appeared to be the same person.

7. Instagram is a mobile, desktop, and Internet-based photo-sharing application and service that allows users to share pictures and videos either publicly, or privately to pre-approved followers. It was created by Kevin Systrom and Mike Krieger and launched in October 2010 as a free mobile app exclusively for the iOS operating system. A version for Android devices was released two years later, in April 2012, followed by a feature-limited website interface in November 2012, and apps for Windows 10 Mobile and Windows 10 in April 2016 and October 2016 respectively. Instagram lets registered users upload photos or videos to the service. Users

can apply various digital filters to their images, and add locations through geotags. They can add hashtags to their posts, linking the photos up to other content on Instagram featuring the same subject or overall topic. Users can connect their Instagram account to other social media profiles, enabling them to share photos to those profiles as well. As of April 2017, Instagram Direct has 375 million active users, while, as of June 2017, the Instagram Stories functionality has over 250 million active users. Instagram was acquired by Facebook in April 2012.

8. C.B. reviewed the photographs her daughter had exchanged on Instagram with users “UE_GIO_2000” and “M2GEO2000,” and saw they were all clothed photographs. The photographs, including profile pictures, of Instagram users “UE_GIO_2000” and “M2GEO2000” appeared to be of someone C.B. suspected was over the age of 18. C.B. found this troubling and she began to look more closely at MV1’s devices as well as MV1’s various social media, messaging, and e-mail accounts.

9. C.B. located two phones in her daughter’s possession, one of which was a device she did not know her daughter had. One of the phones was a Verizon phone she had purchased for her daughter, and the other was a Samsung phone with only Wi-Fi capability she did not know her daughter had.

10. In reviewing MV1’s text messages, C.B. noticed references to Snapchat and Instagram chats. C.B. noticed Snapchat was not installed on the Samsung phone, so she downloaded Snapchat, and was able to restore MV1’s account. In reviewing MV1’s Snapchat account, C.B. saw numerous images and videos of MV1 unclothed and masturbating, and saw MV1 had sent the images and videos to Snapchat account “M_GEO4019.” Snapchat account “M_GEO4019” also sent unclothed and masturbation images and videos to MV1.

11. Snapchat is a multimedia messaging app used globally, created by Evan Spiegel, Bobby Murphy, and Reggie Brown, former students at Stanford University, and developed by Snap Inc., originally Snapchat Inc. One of the principal features of Snapchat is that pictures and messages are usually only available for a short time before they become inaccessible to their recipients. The app has evolved from originally focusing on person-to-person photo sharing to presently featuring users' "Stories" of 24 hours of chronological content, along with "Discover", letting brands show ad-supported short-form content. As of February 2018, Snapchat has 187 million daily active users.

12. C.B. also told the responding officer that within Snapchat she discovered nude photographs and videos from approximately six to seven months ago, approximately April 2022. Furthermore, since C.B did not find any other sent or saved nude photographs or videos after this date, she believed that any other nude photographs or videos must have been deleted after this date. The only exception was that MV1 sent a video last Saturday (approximately November 12, 2022) to "M_GEO4019" which showed MV1 orally copulating a hand sanitizer bottle.

13. RPD Officer Nguyen went to C.B.'s house to collect the phone used to send the nude images to the suspect. When Officer Nguyen arrived, C.B. told her the images and videos of the suspect had disappeared from the Snapchat application.

14. C.B. told Officer Nguyen she still had access to MV1's nude photographs and videos which she sent to "M_GEO4019" through Snapchat. In an effort to preserve these photographs and videos from being deleted, Officer Nguyen told C.B. to take screen shots of them to save them on the Galaxy phone itself. After doing this, C.B. told Officer Nguyen "M_GEO4019" then started messaging MV1's cell phone to ask her why she was taking screen shots of her cell phone. C.B. told Officer Nguyen she did not respond to this male's inquiries, but

she believed that this male had deleted his nude photographs and videos and that he was now able to also tell that screen shots were being taken from MV1's Snapchat account¹.

15. Officer Nguyen collected the Samsung phone and booked it into evidence at the RPD.

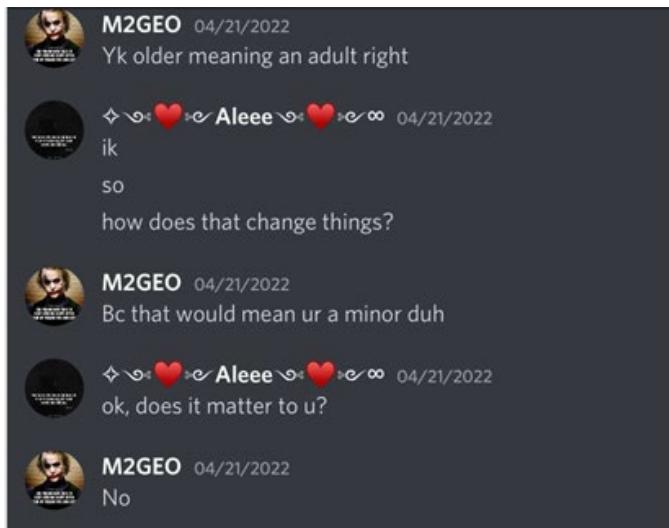
16. On November 22, 2022, TFO Holcombe spoke with C.B. over the phone. C.B. stated since filing the report with RPD on November 14, 2022, she had learned her daughter was also communicating with the suspect via Discord.

17. Based on this affiant's own experiences and those of other law enforcement officers, this affiant knows that Discord, Inc. owns and operates a free messaging platform where millions of users from around the world connect with each other through chat, voice, and video. Discord, Inc. provides this platform on both desktop (PC, MAC, and Linux) application and mobile (iOS and Android) application. Once a user of Discord's application creates a username and account, the user can create a server and invite friends to join the invite link or join existing servers. Servers can be broken down into subcategories or "channels" where users can connect with each other by either chatting or calling. Users can also communicate through direct messages or private chats between one to ten users. This information is relevant to this investigation in that it may establish a direct connection with the suspect or identify witnesses.

18. According to Discord's privacy policy, it retains device IDs and IP addresses related to users' activity. Discord allows users to connect other social networking profiles to a Discord profile. Discord keeps information from those linked social networking accounts. Discord also uses cookies to keep track of the user's computer and browser settings. Discord also allows for advertisements.

¹ When using Snapchat, taking a screenshot will send a notification to the other user's device.

19. C.B. sent TFO Holcombe a screen capture of some of the conversations her daughter had with the suspect on Discord. The suspect was using the Discord display name of “M2GEO” and MV1 was using a display name of “Aleee.” The conversation appears to have occurred on April 21, 2022. The conversation seemed to indicate that “M2GEO” knew that MV1 was under 18 years old age.



20. Through a review of messages within Discord, C.B. learned that the suspect’s name was Gevoni BROWN and his date of birth was August 31, 2000. C.B. stated she also learned he was a Marine stationed in Florida, and his phone number had the last four digits of 8594.

21. C.B. described the photographs she observed on MV1’s phone and stated they were sexually explicit and depicted her daughter masturbating. C.B. also said she saw videos of BROWN masturbating and in some of the videos BROWN’s face is visible.

22. On November 22, 2022, TFO Holcombe sent Snapchat and Instagram preservation letters, requesting they preserve all data on the accounts used by both BROWN and MV1.

23. On November 23, 2022, TFO Holcombe sent Discord a preservation letter for both BROWN’s and MV1’s accounts.

24. TFO Holcombe was able to locate an Instagram account with the username “M2GEO2000.” The account was private, however, a profile picture was visible, and depicted a male in what appeared to be a Marine uniform. TFO Holcombe did a search of open source and law enforcement databases and located a name and date of birth match to a subject named Gevoni Rayon BROWN, date of birth August 31, 2000, living in West Park, Broward County, Florida.

25. On November 28, 2022, TFO Holcombe obtained a search warrant for the Discord account with the username “M2GEO#1938,” which was associated with BROWN, and was the account behind the display name “M2GEO,” and the account with username “Aleee#5727,” which was associated with MV1, and was the account behind the display name “Aleee.” The warrant was approved by Judge Clare Maier, Superior Court Judge for Contra Costa County, California.

26. On December 5, 2022, Discord responded and provided chat and account details as well as IP connection history for the accounts named “M2GEO#1938” and “Aleee#5727.”

27. TFO Holcombe analyzed the Discord account for MV1 based on the search warrant return. TFO Holcombe located images and videos of sexually explicit content in MV1’s account which appears to be self-produced. Each image or video has a unique file name. Using that unique file name, TFO Holcombe was able to locate where within the chat messages the transmission of that media file occurred.

28. The chats begin on or about March 4, 2022, and end on or about June 26, 2022.

29. Chat records indicate, on or about March 4, 2022, BROWN tells MV1 he is 17 years old, and MV1 tells BROWN she is 15.

30. On or about March 17, 2022, BROWN and MV1 are messaging each other and BROWN writes, “Remember I wanted to hear u moan while you touch yourself.” BROWN continued by writing, “That was the first thing I asked for.” MV1 responded by writing, “Oh I

did.” BROWN said, “Unless you wanna put that with the fingering video.” They discussed whether or not MV1 should send the video. MV1 sent BROWN a video depicting a female on a bed wearing an off-white pair of underwear and she was using her left hand to rub her vagina over her underwear. BROWN told MV1 he wanted a video of her “fingering herself.”

31. On or about April 1, 2022, MV1 told BROWN the photos and videos she had been sending him were someone else and she promised not to keep any more secrets from him. MV1 sent BROWN a selfie.

32. On or about April 1, 2022, BROWN asked MV1 if she would ever send nudes to him with her face visible. MV1 said she would think about it. BROWN followed that up by telling MV1, “I would love to see ur orgasm face or ur moaning face.”

33. On or about April 2, 2022, BROWN asked MV1 for sexually explicit content. BROWN wrote to her, “I wanna see u finger yourself and also see your face in it so I can see ur moaning face and it has to be a 1min video.” It appeared, based on the next text messages, that MV1 sent BROWN a sexually explicit video. The video was not saved in the account. Brown complained MV1 was only rubbing herself and told her, “Like rlly finger yourself.” MV1 sent Brown two more videos, and Brown continued to complain he cannot see her face or she was not making the videos the way he wanted. After MV1 sent him the last videos, Brown told her, “Ima have to teach u how to finger yourself.”

34. On or about April 3, 2022, BROWN messaged MV1, “I got my requests ready.” Brown tells MV1 that his requests are:

- a. BROWN: Fingering fast motions no rubbing and with ur face in it
- b. BROWN: Moan more I couldn't hear u last time
- c. BROWN: 1min and 30 sec

d. BROWN: And fully nude

35. On or about April 9, 2022, BROWN made a request from MV1 for sexually explicit

content:

a. BROWN: Fingering with ur face in I again

b. BROWN: And I don't have to hear u

c. MV1 sent BROWN a video that was 29 seconds long and depicted MV1 masturbating. MV1's face was visible in the video.

36. On or about April 12, 2022, BROWN made additional requests for videos from

MV1.

a. BROWN: Remember I wanted a show

b. BROWN: With u getting fully nude

c. BROWN: I want everything ass and all

d. BROWN: Just giving me a show of u fully nude

e. BROWN: Ass and all

f. BROWN: 1min and 30sec

g. BROWN: And calling Me daddy geo

h. BROWN: The second video was supposed to be u using 2 fingers and rapidly fingerings yourself

i. MV1 sent Brown two videos. The first video was 7 seconds long and depicted MV1's face. In that video MV1 was nude and films her buttocks and vagina briefly and then her breasts. The second video was 59 seconds long and depicted MV1 nude and masturbating.

37. BROWN continued to make requests for new videos from MV1.

- a. BROWN: Babe last one please bend over for me I'm about to cum
- b. BROWN: I wanted a video to complete the 1min and 30sec
- c. BROWN: Please
- d. BROWN: I need to cum
- e. BROWN: Spread ur cheeks too
- f. MV1 sent BROWN a video that was 12 seconds long and depicted MV1 nude from the waist down. MV1 exposes her buttocks and vagina to the camera.

38. On or about April 15, 2022, Brown told MV1, "Beg me to fuck you." BROWN told MV1, "3 secs not gonna make me cum," and then "Yes babe keep going." MV1 sent BROWN two videos. The first video was 29 seconds long and depicted MV1 masturbating. The second video was eight seconds long and also depicted MV1 masturbating.

39. On or about April 17, 2022, Brown discussed making sexually explicit videos with MV1.

- a. BROWN: Doggy then missionary
- b. BROWN: Wait r u videoing those
- c. MV1: What do u think
- d. BROWN: Yk what missionary is right?
- e. MV1: yes yes ill do those another time, i was just asking
- f. BROWN: U can't ask and no do

40. On or about April 20, 2022, Brown requests more sexually explicit videos from MV1.

- a. BROWN: Wherrs the min ones

- b. BROWN: U got me going crazy
- c. MV1: I'll make them soon
- d. MV1: Suffer for now
- e. BROWN: Kk mommy
- f. MV1 sent BROWN a video that was 9 seconds long and depicted MV1 nude and exposing her breasts.

41. BROWN, on April 20, 2022, continued to ask for more videos:

- a. BROWN: Please
- b. BROWN: Cum for daddy
- c. BROWN: I want ur cum so badly
- d. BROWN: Please please mommy
- e. BROWN: *gets on knees*
- f. MV1: I'll make a 1minute one now
- g. BROWN: You need to be fingering yourself
- h. BROWN: And not that's slow rubbing stuff u rlly gotta get into it
- i. MV1 sent BROWN a video that was seven seconds long and depicted MV1 masturbating.

42. BROWN seemed displeased with the seven second video and encouraged MV1 to make another one for him.

- a. BROWN: More babe more
- b. BROWN: Constant fingering
- c. MV1: Stop bossing me
- d. MV1 sent BROWN a seven second video that depicted MV1 masturbating.

43. BROWN, on April 20, 2022, kept asking MV1 for more videos.

- a. BROWN: Cum vabe
- b. BROWN: Babe
- c. BROWN: From the back fingering
- d. BROWN: Ooooo
- e. BROWN: Arch all the way down
- f. MV1 sent BROWN a video that was 59 seconds long and depicted MV1 masturbating.

44. In the chats, BROWN sent “selfie” style images of himself to MV1. TFO Holcombe compared these images BROWN sent MV1 to BROWN’s Florida Driver’s License picture and determined they are the same person.



Selfie sent from BROWN to MV1.



BROWN’s Florida Driver License Photo

45. In reviewing BROWN’s Discord, TFO Holcombe also located chats between BROWN and Discord user “laya.#0420,” a possible Minor Victim 2 (MV2). The chats started on or about November 20, 2022, and continued through November 21, 2022. BROWN initiated the conversation. MV2 told BROWN she was 16 years old, and BROWN told her he was 17. BROWN

sent her several “selfie” style images of himself. TFO Holcombe compared these images BROWN sent MV2 (selfie style images) to BROWN’s Florida Driver’s license picture and determined they are the same person.

46. MV2 told BROWN she “sells,” which based on this affiants training and experience, usually means a user will sell sexually explicit content. They engaged in the following conversation.

- a. BROWN: How much you sellin for
- b. MV2: I don’t have a certain price, I work with budgets
- c. BROWN: ooohhh ok ok
- d. BROWN: Do I still have an opportunity to get to knowu
- e. BROWN: \$10
- f. MV2: ?
- g. BROWN: I’ll buy ur stuff
- h. MV2: umm okay
- i. MV2: Do you use cashapp
- j. BROWN: Yea
- k. MV2: Okay, what content do u want to see?
- l. BROWN: What do u do
- m. BROWN: Give me options
- n. MV2: I do lewd pics and vids
- o. MV2: well
- p. MV2: I can do ass vids, tits
- q. MV2: Feet too

r. BROWN: Ok both

s. MV2: Okay

47. MV2 sent BROWN her Cashapp account name and BROWN texted her, “ok done.”

MV2 sent BROWN a message which could not be viewed but was likely a link to the content he purchased because the next message from BROWN to MV2 read, “damn nice ass.” The conversation ended shortly after.

48. Based on the review of the search warrant return for BROWN’s Discord account, TFO Holcombe identified nine additional chat conversations between BROWN and individuals who claimed to be anywhere from 14 to 17 years of age. The conversations were similar in nature to the conversations with MV1 and MV2.

49. TFO Holcombe reviewed the subscriber records and IP logs used to access BROWN’s Discord account. The account created on September 27, 2021, using e-mail account gevonibrown@gmail.com. The last four digits of the phone number used to establish the account were 7031 and the account was registered on September 9, 2021.

50. The Discord return included IP connection logs from June 2, 2022, to November 27, 2022. Several IP addresses were included in the Discord connection log. The most common IP address to connect to the Discord was 73.124.142.42. That IP address geolocated to Hollywood, Florida. Hollywood, Florida, is adjacent to West Park, Florida, which was the city of residence reflected on BROWN’s Florida Driver License.

51. Several IP addresses listed in the connection log were assigned to T-Mobile and the phone number with the last four digits of 7031 that was connected with the Discord account was assigned to T-Mobile.

52. On December 8, 2022, a Department of Homeland Security Summons was served on T-Mobile requesting subscriber information and tolls for phone number with the last four digits of 7031. On December 9, 2022, T-Mobile provided a return that included limited toll information and advised the phone number is allocated to pre-paid provider Lyca Plus.

53. On December 9, 2022, a Department of Homeland Security Summons was served on Lycamobile USA requesting subscriber information and tolls for the phone number with the last four digits of 7031. On December 9, 2022, Lycamobile USA responded. Although no subscriber name and address was listed on the account, the account was opened with e-mail address gevonibrown@gmail.com and indicated a customer registration IP address of 73.124.142.42.

54. Beginning on November 18, 2022, and continuing through November 25, 2022, IP address 4.7.53.62 connected to the “M2GEO#1938” Discord account approximately eight times. That IP address geolocated to Waynesville, Missouri, which was adjacent to Ft. Leonard Wood, Missouri.

55. On December 7, 2022, this affiant contacted U.S. Army Criminal Investigative Division (CID) at Ft. Leonard Wood for assistance with the present investigation.

56. On December 8, 2022, CID contacted this affiant and confirmed that BROWN is a United States Marine Corps Private currently attending training on Fort Leonard Wood, Pulaski County, Missouri. According to CID, BROWN arrived at Ft. Leonard Wood on November 9, 2022. CID advised BROWN was being housed on the Fort Leonard Wood base, in Building 1776, Room 303. Room 303 is shared/occupied by BROWN and three other Marines.

57. On December 14, 2022, SA Bluto, TFO Holcombe, CID Special Agents, and HSI Special Agents, executed a federal search warrant on BROWN’s barracks room, on the Fort

Leonard Wood base, in Building 1776, Room 303. Room 303 was occupied by BROWN and three other Marines.

58. During the search warrant, two cellular phones belonging to BROWN, an Apple iPhone XR and a Samsung A50, were recovered. Based on this affiant's training and experience, this affiant believes that neither cellular phone was manufactured in the State of Missouri, therefore both phones would have had to travel in interstate or foreign commerce during or before the time that BROWN possessed them.

59. BROWN's cellular phones were turned over to Springfield Police Department (SPD) Computer Forensic Analyst (CFA) Michael Costello so that he could conduct a forensic preview on the phones.

60. CFA Costello located Snapchat on the iPhone XR and verified the account "M_GEO4019" was logged in. "M_GEO4019" was one of the Snapchat accounts that communicated with MV1.

61. CFA Costello observed the MEGA app was installed on the iPhone XR. The MEGA account was logged in and contained approximately 68 gigabytes of data. CFA Costello previewed several files in the MEGA app and he determined that those files depicted child pornography.

62. Mega (stylized in uppercase as MEGA) is a cloud storage and file hosting service offered by Mega Limited, an Auckland-based company. The service is offered primarily through web-based apps. Mega mobile apps are also available for Windows Phone, Android and iOS. Mega is known for its security feature where all files are end-to-end encrypted locally before they are uploaded. This prevents anyone (including employees of Mega Limited) from accessing the files without knowledge of the pass key used for encryption. The service was previously noted for

a large 50 GB storage allocation for free accounts. However, this was reduced to 15 GB, with additional amounts offered only on an expiring trial basis. Up to 8 TB is available for paid accounts. As of January 20, 2018, Mega claims to have 100 million registered users in more than 245 countries and territories, and more than 40 billion files have been uploaded to the service.

63. CFA Costello observed the Telegram app was installed on both the iPhone XR and the Samsung A60. A preview of the messages and groups within the Telegram account on both phones revealed several discussions related to child pornography.

64. Telegram is a cloud-based instant messaging and voice over IP service developed by Telegram Messenger LLP, a privately held company registered in London, United Kingdom, founded by the Russian entrepreneur Pavel Durov. Telegram client apps are available for Android, iOS, Windows Phone, Windows NT, macOS and Linux. Users can send messages and exchange photos, videos, stickers, audio and files of any type. Messages and media in Telegram are only client-server encrypted and stored on the servers by default. The service provides end-to-end encryption for voice calls, and optional end-to-end encrypted "secret" chats between two online users, yet not for groups or channels.

65. CFA Costello observed Instagram was installed on the Samsung A50 and verified account "UE_GEO_2000" was logged in. "UE_GEO_2000" was one of the Instagram accounts that communicated with MV1.

66. CFA Costello found several Google accounts on the Samsung A50, including the Google account, gevonibrown@gmail.com. Under Google Photos account linked to gevonibrown@gmail.com, CFA Costello found two folders labeled "Ale." The first folder contained 46 files and the second folder contained 77 files. CFA Costello observed several files and found they were close-up images and videos of breasts and vaginas.

67. CFA Costello observed Discord was installed on the Samsung A50 and the display name was “N2GEO.” “N2GEO” is the same account that engaged in chats involving the solicitation and receipt of exploitive images from MV1.

68. TFO Holcombe and SA Pluto interviewed BROWN in a government vehicle. BROWN was advised of his *Miranda* Rights and signed a form indicating he understood his rights and was willing to speak to investigators. During the interview BROWN confirmed that his email address was gevonibrown@gmail.com.

69. BROWN stated he specifically remembered chat conversations with Discord user “Aleee,” an account belonging to MV1. BROWN stated “Aleee” told him she was 14 years old when they began chatting. BROWN admitted to engaging in sexually explicit chat conversations with “Aleee,” and requesting sexually explicit photos and videos of “Aleee” to include masturbation. BROWN stated he also sent “Aleee” sexually explicit photos and videos to include videos of him masturbating. BROWN stated several of the photos and videos he received from “Aleee” were stored in a Google Photos folder labeled “Ale”.

70. BROWN specifically remembered Discord chat conversations with user “laya.#0420”. BROWN indicated “laya.#0420” said she was 16 years old and admitted to paying her \$10 for sexually explicit photographs.

71. BROWN stated prior to arriving at Fort Leonard Wood, Missouri, on approximately November 9, 2022, BROWN was in North Carolina. BROWN stated he traveled from North Carolina to Missouri via airplane. BROWN stated the iPhone and Samsung A50 were in his possession on the trip.

72. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against Gevoni Rayon BROWN for violation of 18 U.S.C. § 2522(a)(1), that is, transportation of child pornography.

JEREMY BLUTO
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me via telephone on the 15th day of December 2022.


HONORABLE DAVID P. RUSH
Chief United States Magistrate Judge
Western District of Missouri